



Gray Davis  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse



Tal Finney  
Interim Director

**ACKNOWLEDGEMENT OF RECEIPT**

DATE: April 7, 2003

TO: Ellen Wagner  
Department of Parks and Recreation  
One Capitol Mall, Suite 500  
Sacramento, CA 95814

RE: The Forest of Nisene Marks State Park General Plan  
SCH#: 2001022080

**RECEIVED**

APR 08 2003

NORTHERN SERVICE  
CENTER

This is to acknowledge that the State Clearinghouse has received your environmental document for state review. The review period assigned by the State Clearinghouse is:

Review Start Date: March 27, 2003  
Review End Date: May 12, 2003

We have distributed your document to the following agencies and departments:

California Coastal Commission  
Caltrans, District 5  
Department of Conservation  
Department of Fish and Game, Region 3  
Department of Forestry and Fire Protection  
Department of Parks and Recreation  
Native American Heritage Commission  
Regional Water Quality Control Board, Region 3  
Resources Agency  
State Water Resources Control Board, Division of Water Quality

The State Clearinghouse will provide a closing letter with any state agency comments to your attention on the date following the close of the review period.

Thank you for your participation in the State Clearinghouse review process.



Gray Davis  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse



Tal Finney  
Interim Director

May 13, 2003

Ellen Wagner  
Department of Parks and Recreation  
One Capitol Mall, Suite 500  
Sacramento, CA 95814

Subject: The Forest of Nisene Marks State Park General Plan  
SCH#: 2001022080

Dear Ellen Wagner:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on May 12, 2003, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Terry Roberts  
Director, State Clearinghouse

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2001022080  
**Project Title** The Forest of Nisene Marks State Park General Plan  
**Lead Agency** Parks and Recreation, Department of

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**Type** EIR Draft EIR  
**Description** The General Plan provides long-term goals, guidelines, and directions for the operation, development, management, interpretation and resource management, for this State Park.

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**Lead Agency Contact**

**Name** Ellen Wagner  
**Agency** Department of Parks and Recreation  
**Phone** 916-445-8929 **Fax**  
**email**  
**Address** One Capitol Mall, Suite 500  
**City** Sacramento **State** CA **Zip** 95814

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**Project Location**

**County** Santa Cruz  
**City**  
**Region**  
**Cross Streets** Aptos Creek Road  
**Parcel No.**  
**Township** **Range** **Section** **Base**

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**Proximity to:**

**Highways** Hwy 1  
**Airports**  
**Railways**  
**Waterways** Aptos Creek  
**Schools** Cabrillo Col., Salesian Col., Mar Vista School  
**Land Use** The Forest Nisene Marks State Park/Recreation

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**Project Issues** Aesthetic/Visual; Air Quality; Archaeologic-Historic; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Noise; Other Issues; Public Services; Recreation/Parks; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Landuse; Cumulative Effects

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**Reviewing Agencies** Resources Agency; California Coastal Commission; Department of Conservation; Department of Fish and Game, Region 3; Department of Forestry and Fire Protection; Department of Parks and Recreation; Caltrans, District 5; State Water Resources Control Board, Division of Water Quality; Regional Water Quality Control Board, Region 3; Native American Heritage Commission

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**Date Received** 03/27/2003 **Start of Review** 03/27/2003 **End of Review** 05/12/2003

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APR 02 2003

03-28-03

California State Parks  
Northern Service Center  
Attn: Ellen Wagner  
P.O. Box 942896  
Sacramento, CA 94296-0001

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Ellen

After reading the Nisene Marks General Plan I have a number of things I would like to mention to you, in hopes that you will consider introducing my suggestions into the plan. I should mention that I really enjoyed reading the plan, and that I agree with the overall message of it; that we need to allow the park to rejuvenate and to keep it as pristine as possible. Yet I see what a difficult task it will be, in light of the proposed increased access. I also see the irony in this situation that the plan is attempting to address: increase access to alleviate overuse on existing trails. My personal belief is that the biggest problem that threatens open space is population growth. With that in mind, I would like to put forth my ideas about how the park plan can accommodate this increased use.

First of all, I think that Alternative C best accomplishes the park's goal. It allows loop options and new access on new areas. There was an Alternative D plan, drafted on 10/10/01, which had awesome amounts of single-track loop options, but I guess that is no longer a valid plan. In any event, I think that the plan that allows for the most single-track access will be the most successful, ironically.

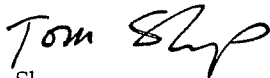
Secondly, as population increases the viability of horse ownership and therefore access will decline. Only the wealthiest people will be able to board a horse as land value increases, afford to buy a big truck, horse trailer and the gas to power it, etc. etc. Not to mention all the erosion problems horses cause. So it makes sense for the park service to continue to not allow horse access, and possibly even eliminate it altogether.

Following that logic, one asks which types of recreation will increase. To that I answer hiking, running, and biking. I am happy to see that Alternative C includes increased single-track access for these groups. I can't stress enough how important hiking, running, and biking access is and will become. And any loop options that connect the Soquel Demonstration Forest with Nisene Marks will only help alleviate any hiking, running, and biking overuse problems.

I am a trail worker/volunteer in my spare time, and belong to many clubs that support sustainable land access and conservation. I have seen and repaired trail damage many times. Every time we open up new routes we see decreased trail damage and an obvious increased "carrying capacity" of the trail system. This makes everyone happy.

In closing I would like to wish you the best of luck in solving the task at hand. I must ask you again, as you are drafting your final plan, to please include increased single-track access for hikers, runners, and bikers.

Thank you,



Tom Sharp  
1787 Shoreview Ave.  
San Mateo, CA 94401

Dennis Renault 15 Linda Vista Drive Monterey, California 93940

V: 831/642-6300 e: [mockingbird@redshift.com](mailto:mockingbird@redshift.com)

March 31, 2003

California State Parks  
Northern Service Center  
P.O. Box 942896  
Sacramento, CA 94296-0001

RE: Forest of Nisene Marks SP

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APR 04 2003

NORTHERN SERVICE  
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Attn: Ms. Ellen Wagner:

Dear Ms Wagner:

It is impossible to overstate our **objections** to the decision declaring the use of mountain bikes compatible within Forest of Nisene Marks State Park.

We strongly urge the General Plan be changed to eliminate the proposed language claiming mountain bike use is in conformity with the Marks' deed designating their gift as a "natural preserve to be used for camping, hiking and nature study."

4

There are many other places where mountain biking fits the natural conditions desired by its proponents. The Forest of Nisene Marks is **definitely not** one of these.

We cannot attend the April 12<sup>th</sup> meeting in Aptos and this statement represents our sincere feelings on the issue.

Yours truly,



Dennis Renault



Marty Renault



# MONTEREY BAY

Unified Air Pollution Control District  
serving Monterey, San Benito, and Santa Cruz counties

AIR POLLUTION CONTROL OFFICER  
Douglas Quetin

24580 Silver Cloud Court • Monterey, California 93940 • 831/647-9411 • FAX 831/647-8501

April 1, 2003

## DISTRICT BOARD MEMBERS

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Ellen Wagner  
Associate Park and Recreation Specialist  
Department of Parks and Recreation  
Northern Service Center  
P.O. Box 942896  
Sacramento, CA 994296-0001

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APR 04 2003

NORTHERN SERVICE  
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SUBJECT: DEIR FOR FOREST OF NISENE MARKS GENERAL PLAN

Dear Ms. Wagner:

Staff has reviewed the referenced document and has the following comments:

1. Page 124. The NCCAB is a maintenance area for the federal 1-hour ozone standard. 5
2. Page 125. The most recent AQMP was adopted in 2000. 6
3. Page 125. The closest PM<sub>10</sub> monitoring station to the proposed project is at Davenport. Data from this site would be more appropriate to reference than data from the Salinas station. Table 8 should be updated to reference 2000-2002 ozone and PM<sub>10</sub> data. These data are available from the District. 7
4. Page 134. The District's thresholds of significance for VOC and NO<sub>x</sub> are 137 lb/day. These thresholds should be used to determine project level impacts on regional ozone levels at the time specific information is available. 8
5. Emissions from prescribed burns are addressed in the summary on page 119 but not in the impact analysis. VOC and NO<sub>x</sub> emissions which exceed prescribed burn emissions included in the 2000 AQMP of 11.8 tons per day of VOC and 3 tons per day of NO<sub>x</sub> would have a significant cumulative impact on regional ozone levels during ozone season (May through October). District rules allow for these thresholds to be exceeded under certain circumstances; in such an event, the project would be determined to have a significant cumulative impact. See enclosed Table 3-1 from the District's FEIR on the Smoke Management Program. 9

Thank you for the opportunity to review the document. Please do not hesitate to call if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Janet Brennan", written over a horizontal line.

Janet Brennan  
Supervising Planner  
Planning and Air Monitoring Division

c: Nicolas Papadakis, AMBAG

Enc.

**TABLE 3-1 TYPICAL DAILY ACREAGE THAT COULD BE BURNED BY VEGETATION TYPE IN ORDER TO EQUATE WITH THE NCCAB's 2005 EMISSION INVENTORY FOR PRESCRIBED BURNING**

Criteria Pollutant	2005 Inventory (Tons/Day)	Equivalent Burn By Vegetation Type (Acres/Day)					
		Grassland	Scrub Brush	Low Chaparral	Moderate Chaparral	High Chaparral	Forest Under Story
VOC	11.8	1,047	523	246	123	84	64
NO <sub>x</sub>	3.0	1,038	519	247	124	84	65
MAXIMUM VALUE		1,038	519	246	123	84	64

#### Public Notification of Sensitive Receptors Downwind

PM<sub>10</sub> and toxic air contaminant impacts off-site will be determined on a project-by-project basis using data extrapolated from an approved air quality model. When a project would cause or contribute to violations of standards of PM10 and air toxics, sensitive receptors downwind would be notified directly.

#### Elimination of ARB 48 Hour Commitment

Previously, in cases where range improvement burning or forest management burning projects received a commitment from ARB that conditions would be conducive to burning in the next 48-hour period, such projects were allowed to proceed, whether or not the day that the burn was eventually conducted was declared a permissive burn day. It was therefore possible that burns that had received an ARB commitment could be conducted on a "no-burn" day. That provision has been eliminated by revisions to Title 17 and will be removed from the District's Rules. The ARB commitment has been changed to a 48 hour "outlook" or non-binding forecast, although the eventual burn day still has to be a permissive burn day.

#### Rule Revisions

The following rules would be amended to incorporate the elements of the burn program and other changes as needed to meet State requirements:

- Rule 407 (Open Outdoor Fires)
- Rule 409 (Burning of Agricultural Wastes)
- Rule 410 (Range Improvement Burning)
- Rule 411 (Forest Management Burning)
- Rule 422 (Burning of Wood Wastes from Developments)
- Rule 432 (Wildland Vegetation Management Burning):



Robert F. Mitchell  
709 Graham Hill Rd.  
Santa Cruz, California 95060  
Home Phone: 831-426-5374  
Email: Bobbo97@aol.com

April 2, 2003

California State Parks  
Northern Service Center  
ATTN: Ellen Wagner  
P.O. Box 942896  
Sacramento, CA 94296-0001

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APR 07 2003

NORTHERN SERVICE  
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Re: Prelim Gen Plan/Draft EIR  
Forest of Nisene Marks State Park

Gentlemen & Ladies:

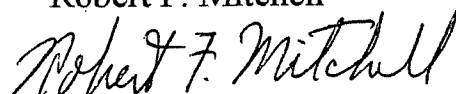
I would like to express a comment/opinion about the captioned Plan. I am a frequent visitor to this pristine park. One of it's principal attractions is that it is remote and pristine. The proposed plan would appear to diminish it's beauty and be contrary to the intentions of the donors (or deed grantors) of this park. I am referring to the proposed usage of remote hiking trails by mountain bikes.

It is my understanding that the donors intended that the park's trails located beyond the iron/steel bridge be preserved for wilderness use. While the deed language may not refer specifically to bicycles or other mechanical conveyances the only reasonable interpretation of the donor's intent is that they were not to be permitted on such trails. It is apparent to anyone hiking these trails that their increasing (and illegal) use by mountain bikes is rapidly destroying the trails. To implement a plan which authorizes such use will result in making such trails difficult or impossible to use by hikers.

There are many wilderness trails in this park which are available to bikers. In addition, the back areas of the park are also open to bikers who use the dirt road therein. Why destroy wilderness trails and one of the finest hiking places in Santa Cruz County just to give bikers more area to ruin?

Please revise the Plan to ensure that mechanical conveyances are not permitted beyond the bridge except on the road.

Robert F. Mitchell



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APR 09 2003

NORTHERN SERVICE  
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104 Montclair Drive  
Santa Cruz, CA 95060  
April 6, 2003

Californial State Parks  
Northern Service Center  
Attn: Ellen Wagner  
P.O. Box 942896  
Sacramento, CA 94296-0001

Dear Ms. Wagner,

I understand that under consideration by the State Parks Department is a plan to allow mountain biking on the single-track trails above the steel bridge in Forest of Nisene Marks State park. Please DO NOT allow that to happen.

It is unpleasant enough now for walkers on the fire roads in the park to have bikers zooming down on them from above. But these are wide roads with, in principle, room for both bikers and hikers. And since trails are still free of bikers they are an escape for walkers and others who enjoy the serenity of the park. But having bikers on the narrow trails would be dangerous and utterly destroy the experience for the walkers and these others (not to mention the physical integrity of the trails themselves). It is hard to imagine that allowing this would not violate the original deed by which the property was transferred to the state. It would effectively become a park for bikers to the exclusion of others and this seems not right. Please do not allow it to happen

13

Sincerely,

*Harold Widom*

Harold Widom

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APR 09 2003

NORTHERN SERVICE  
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April 6, 2003

RE: Nisene Marks

As a long time resident of Santa Cruz, I feel compelled to extend my comments on the possible changes at Nisene Marks Park.

Although I love to bike ride, ~~ONLY~~ on the large trails, I feel that the intent of <sup>the</sup> legacy should remain as is.

Bikes should be kept off the upper trails. To maintain the serenity and ecology of the area, to maintain the intent of the gift, let's keep it as it is. A vocal minority should not dictate policy to the rest of the park users.

Let's keep this jewel as a natural preserve.

Thank-you  
Javier Leet  
resident and taxpayer

150 Darwin St  
Santa Cruz, Ca  
95062

831 425-5099

243 Siesta Dr.  
Aptos, Calif. 95003  
April 9, 2003

Ellen Wagner  
California State Parks, North Service Center  
PO Box 942896  
Sacramento, Calif. 94296-0001

Dear Ms. Wagner and State Park Officials,

I am writing my concerns regarding the proposed plan to allow bike riders access to the hiking trails above the steel bridge in Nisene Marks State Park.

I have been hiking in that area occasionally since 1978 and weekly since 1986. I have seen the change from a low use, quiet area to one which has improved roads, parking, services and trails, along with a terrific increase in use by everyone from babies to grandparents, dog walkers, joggers, cyclists, picnickers etc. It is dramatically different from its use and looks since 1978. I love that fact that we all have such a valuable resource so close at hand to us. 15

I have intimate knowledge of the upper trails of the Park. Countless times, as my husband and friends walk single file on the fragile and narrow trail system, we encounter cyclists going past us. When we state that these trails are closed to bikes they usually say they are "lost", then smile and sail by us. I have seen them go off the trail onto the forest floor to avoid natural obstacles. I have seen them fall over the side of trails and down hills. I wonder if they attempt, at the speed they are traveling, to avoid banana slugs, salamanders, newts, lizards and wildflowers? I doubt they can even see what they run over. Bike tires are leaving ruts, often wide and gouging, in the upper trails. This has been going on for at least 10 years, in my experience. 16

Nisene is a unique area with narrow and fragile hiking trails above the fire road. The Park allows bike access on the that road, and there is a premier biking area in Wilder as well as other parks. We do not hike at Wilder at all on weekends and holidays due to the difficulty bike traffic causes us there. I commute to work on a bike, we ride for recreation and my husband is a mountain bike rider. We do not oppose trails for bikes. We do oppose bikes on the trails above the steel bridge in Nisene. We want to maintain some of our local hiking areas for walkers only.

Hiking and biking are two very different experiences. We hike to see, smell and listen to our environment. We walk for peace and quiet and spiritual renewal. We walk to experience animals undisturbed by our presence in the wild. All of the activities are part of my experience on the Nisene trails. Bikes are destructive to the environment of those trails as well as the experience of hikers.

Please keep the cyclists on the fire roads in Nisene Marks Park.

Sincerely,

*Valerie Nelson*  
Valerie Nelson

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APR 14 2003

NORTHERN SERVICE  
CENTER

899 Calabasas Road  
Watsonville, CA 95076  
April 11, 2003

California State Parks Northern Service Center  
Attention: Ellen Wagner    Subject: Trails in Nisene Marks State Park  
Dear Ms Wagner:

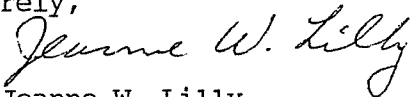
My family and I have hiked on the trails of Nisene Marks State Park since we moved to Santa Cruz County in 1969. Our home is within 15 minutes of the park. We cherish its natural beauty in all seasons. The diversified forest with its wild life, birds, and peaceful atmosphere are truly a joy to experience.

The proposal to allow bicycle riding on the narrow trails is very ill-advised. The paths are steep, with curves that block visibility. Cycles can easily get out of control and cause accidents. Hikers are not expecting to be confronted with cyclists speeding down the hills. 17

Bike riders traveling on the fire road have already established a reputation for discourtesy to walkers. They come up from behind one without warning and pass' dangerously close. None of the bikes even has a bell. Allowing cyclists to use the narrow paths would only aggravate an existing problem. 18

While the terms of the deed may be argued at meetings, the practical answer is NO. Do not allow bicycle riding on the trails of Nisene Marks State Park. In fact, require cyclists on the fire road to have bells and use them. Let's keep hiking in the park a safe, joyful experience, not a scary dodging of wheeled vehicles.

Sincerely,



Mrs. Jeanne W. Lilly

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APR 14 2003

cc: Rich Apple

NORTHERN SERVICE  
CENTER

Elise Legare

315 1/2 Cleveland Ave.  
Santa Cruz, CA. 95060

April 10, 2003

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APR 14 2003

NORTHERN SERVICE  
CENTER

California State Parks  
Northern Service Center  
Attention: Ellen Wagner  
P.O. Box 942896  
Sacramento, CA. 94296-0001

To Whom It May Concern,

I am writing regarding the Preliminary General Plan / Draft Environmental Impact Report for the Forest of Nisene Marks State Park, and specifically to "vote" in favor of Alternative C (see attached).

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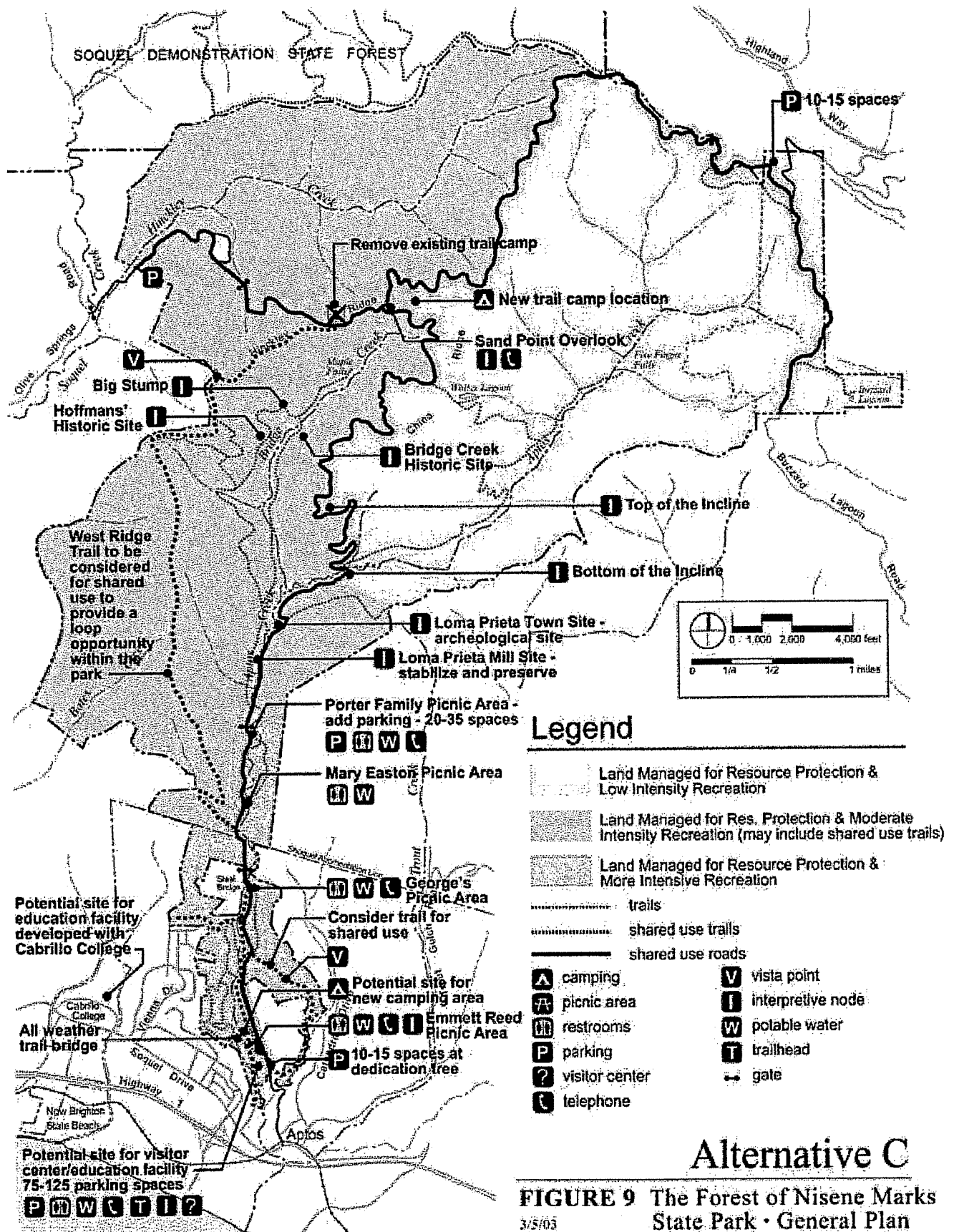
The problem, as I see it, at Nisene Marks, is that almost all the user impact is in the area below the steel bridge, and this is the only area in the park with any singletrack open to bicycles. The report states that only 2% of users make it up to Sand Point, and to me, this is the area of the park that should be open to bicycles. Bicycles can travel far, and it makes sense to get them out of the most impacted areas. But the problem is that in terms of mountain biking, fire roads are boring. Singletrack is fun, and challenging, and yet there are no trails open to mountain bikers in these areas.

The report lists 3 alternatives. Alternative A uses a tactic that is being used extensively now to ban bicycles: turn it into Wilderness. This is unfair, and puts mountain bikers in the uncomfortable position of having to vote against wilderness designation to preserve their access to these areas. It also removes the Aptos Creek fire road that connects Buzzard's Lagoon and the Soquel Demonstration Forest to Nisene Marks. In addition to creating a potentially dangerous situation, this would eliminate a popular training ride for mountain bikers and cyclocross racers. Alternative B is better, but Alternative C opens up the possibility for some singletrack riding in the park.

Off-road cycling is a low-impact, human-powered, legitimate recreation activity with more than 35 million annual U.S. participants (2.5 million in California), that contributes more than \$6 billion annually to the U.S. economy (\$2 billion in California). The majority of cyclists are responsible, considerate riders, who give back to their local trail systems by volunteering on public land, protecting the environment and preserving open space (the people involved with [www.trailworkers.com](http://www.trailworkers.com) have done a fantastic job of working with the Soquel Demonstration Forest, in particular). It's a great form of exercise, it allows people to travel further into the backcountry than they can when walking, and it's fun.

Mountain bikes have a similar impact on the trail as hikers (see <http://www.imba.com/resources/science/index.html>). Trail damage typically stems from poorly constructed heavily used trails. Trails can be built for all user groups to enjoy, to control speed, and to support shared use. There are a lot of alternatives - new trails can be built, trails can be redesigned, there can be one-way trails, trails open only to some user groups, trails open to various user groups at various times, etc. (see [http://www.imba.com/resources/trail\\_building/index.html](http://www.imba.com/resources/trail_building/index.html)).

Mountain bikers have been characterized as thrill-seekers who care nothing about Nature. This is not true of any of the cyclists I know. Most cyclists have a deep love of, and appreciation for, natural beauty, and biking allows one to get further away, deeper into the backcountry, to experience that solitude and peace - *and* exercise hard and have fun on the way. Yes, there are some users, just as in *all* user groups, who don't follow the rules. It is important to judge all trail users by the collective group, not a few inconsiderate people, and to deal with those people rather than excluding an entire user group.





243 Siesta Dr.  
Aptos, Calif. 95003  
April 10, 2003

Ellen Wagner  
California State Parks, North Service Center  
P.O. Box 942896  
Sacramento, Calif. 94296-0001

Dear Ms. Wagner and State Park Officials,

This letter is in regards to my concerns over the proposal to allow mountain bike riders access to the hiking trails above the steel bridge in Nisene Marks Park. I have been hiking in that area weekly since 1987. I have seen an immense change in park use since that time in the increased usage by hikers, bikers, strollers and runners. I live approximately a mile from the Park and really enjoy this remarkable resource.

I am almost 67 years old, and for the last 14 years have enjoyed legal mountain bike riding on Aptos Creek fire road up to Sand Point, as well as beyond to what is known as "the wall" and towards the Buzzard's Lagoon area.

I personally own three different bikes and have been an avid biker for the last 16 years. I commuted to work on my bike for 11 years until my retirement in 1998. I have several friends of 60 year old vintage who also mountain bike on the Aptos Creek fire road.

In my judgment, mountain biking should be restricted away from the upper park trails. The fire road is quite adequate, and nearby Wilder State Park is indeed a nearly unrestricted premier mountain biking venue. Hiking the upper trails of Nisene provides wonderful solitude and communion with natural sights and sounds. Indeed, hiking is by its nature, a different type of experience than mountain biking. Bikers on trails move rapidly, and frequently spook wildlife as well as hikers who are seeking a quiet renewal with nature. The fire road is often rutted after rainstorms due to bike tire marks, and becomes quite dusty after substantial bike usage during the dry months. Translate this kind of usage and resultant erosion to a fragile trail system which already shows wear from unpatrolled illicit mountain bike riding, and you have a devastating environmental impact on the Park.

Please enforce the original intent of the Nisene Marks deed and keep cyclists off the trails and on the fire road. We also need increased surveillance on the upper park trail system.

Sincerely,

*Allen C. Utterback*

Allen C. Utterback

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APR 15 2003

NORTHERN SERVICE  
CENTER

20

Ward, Peter Douglas, The End of Evolution: On Mass Extinctions and the Preservation of Biodiversity. New York: Bantam Books, 1994.

"The Wildlands Project", Wild Earth. Richmond, Vermont: The Cenozoic Society, 1994.

Wilson, Edward O., The Diversity of Life. Cambridge, Massachusetts: Harvard University Press, 1992.

Re: Misene Marks State Park etc,

4-16-2003

Gentlepersons:

Please keep cows and other exotic species out of  
the parks. If allowed in, dogs should be on leash at  
all times. Please restrict bicycles and all other  
vehicles (including mountain boards) to pavement!

21

22

23

Sincerely,

Michael J Vandeman

Michael J. Vandeman

2600 Camino Ramon # 2E850R

San Ramon, CA 94583-5000

RECEIVED

APR 17 2003

NORTHERN SERVICE  
CENTER

The Effects of Mountain Biking on Wildlife and People --  
Why Off-Road Bicycling Should be Prohibited  
Michael J. Vandeman, Ph.D.  
May 31, 1997

Mountain biking is a relatively new sport. According to a mountain biking (MTB) web page (<http://www.mtb-bike.com>), "The commercial Mountain Bike evolution didn't start until 1974 and its first production bikes didn't appear in stores until about 10 years later". (Lower gearing, fat, knobby tires, sturdier construction, but particularly the sealed bearing -- which could be ridden in dirt without getting destroyed -- are what made "mountain" (off-road) bicycling possible.) Partly for this reason, and partly because the MTB is, from one point of view, just a special case of an ORV (off-road vehicle), environmentalists and scientists have been slow to study and recognize the special threat that the mountain bike represents to wildlife. Although there are many studies of ORVs, I am not aware of any solid scientific studies specifically on MTBs and their effects on wildlife.

To most environmentalists, bicycles have always been the epitome of good. We are so used to comparing bikes to cars, that it never occurred to us that the bicycle would be ever used for anything bad. Indeed, replacing motor vehicles with bicycles deserves our adoration. But anything can be used for good or evil, and using bikes to expand human domination of wildlife habitat is clearly harmful.

Human beings think they own every square inch of the Earth, and that they therefore have the right to do what they want with it. This is, of course, absurd. It is also the reason that we are losing species at an unforgivable rate: we have crowded wildlife out of its habitat. Even in our parks, where we have vowed to protect wildlife, it is not protected from hikers, equestrians, park "managers", firefighters, mountain bikers, airplanes, helicopters, cars, roads, concessionaires, or biologists. Thus, the primary reason that mountain bikes are harmful to wildlife is that they, like other technological aids (cars, skis, rafts, rock-climbing equipment, etc.), make it much easier for people to get into wildlife habitat.

(Sadly, most people have forgotten that the only thing that makes parks worth visiting is the wildlife that live there: it is precisely the wildlife (and paucity of humans) that make a park a park. Without wildlife (i.e., all nonhuman, nondomesticated species -- plants as well as animals), the parks would be boring piles of bare rock.)

## Biology

First and most obvious, mountain bikes kill organisms that live on and under the soil: "When it comes to pure recreational destructiveness, ... off-road vehicles (ORVs) far surpass powerboats. ... It is a rare environment indeed where a vehicle can be taken off-road without damage. ... Standard ORVs with their knobby tires are almost ideal devices for smashing plant life and destroying soil. Even driven with extreme care, a dirt bike will degrade about an acre of land in a twenty-mile drive. ... Not only do the ORVs exterminate animals by exterminating plants, they attack them directly as well. Individual animals on the surface and in shallow burrows ... are crushed. ... One great problem with ORVs is that they supply easy access to wilderness areas for unsupervised people who have ... no conception of the damage they are doing" (Ehrlich and Ehrlich, pp.169-171; emphasis added). (Although mountain bikes were hardly known when this was written, it is obvious that the same applies to them.)

Recently, one of the largest Alameda whipsnakes (a California threatened species) ever found was killed by a mountain biker in Black Diamond Mines Regional Preserve near here. Others have been killed on other East Bay regional parks. Kathryn Phillips in Tracking the Vanishing Frogs described how ORVs crossing creeks crush toads and their eggs (both buried in the sand). Bikes are generally ridden too fast to avoid killing small animals. Obviously, the animals didn't evolve in the presence of mountain bikes, and can't be expected to deal very effectively with such quiet, fast-moving objects. Even hikers can kill small animals, if they aren't careful. The one time I went to look for an Alameda whipsnake, I almost stepped on one, which was lying in grass growing in the trail, and didn't move until I had--almost stepped on it.

Soils are extremely complex communities of living organisms. They sometimes are very fragile and once destroyed take decades to be recreated (e.g. desert cryptogamic soil). Soil destruction is hastened by acceleration (braking, speeding up, climbing, and turning, which apply horizontal forces to the soil), by tire lugs, which break the surface, and by water, which softens the soil and makes it easier to demolish.

In the Golden Gate National Recreation Area (GGNRA), "park officials noted serious erosion problems on certain steep narrow trails and determined that restricting bicycle use would slow such erosion. [They] noted that on narrow trails bicyclists passing other users would either leave the trail or force the other users off the

trail to the detriment of off-trail vegetation and wildlife. ... Downhill bicycle travel on steep slopes is usually accompanied by braking and often by skidding which tends to push dislodged surface gravels into ditches, water bars, and drains. Heavy bicycle use on steep trails usually requires that these ditches, water bars, and drains be cleared more frequently than those used by hikers and equestrians only. ... Park staff and visitors reported that bicyclists on these ... trails often skidded to control their speed, slid off of trails on sharp turns, or cut across off-trail areas at certain 'switch-backs'" (Bicycle Trails Council of Marin v. Bruce Babbitt).

Mud containing seeds and spores sticks to bike tires, thereby often carrying species of plants into areas where they had not existed (becoming "exotics"). This is worsened by the fact that bicycles travel long distances, and are often carried to distant locations (sometimes even foreign countries) by motor vehicle. It is well known that such exotic species can cause havoc when introduced into new habitats.

Most of us were raised to believe that "non-consumptive" recreation is harmless to wildlife. We are taught to enjoy ourselves in nature, guilt-free, as long as we don't directly harm wildlife. However, recent research, and the huge scale of current recreation activities, have discredited this idea. "Traditionally, observing, feeding, and photographing wildlife were considered to be 'nonconsumptive' activities because removal of animals from their natural habitats did not occur.... nonconsumptive wildlife recreation was considered relatively benign in terms of its effects on wildlife; today, however, there is a growing recognition that wildlife-viewing recreation can have serious negative impacts on wildlife" (Knight & Gutzwiller, p.257).

In other words, the mere presence of people is often harmful to wildlife, and the more, the worse. "The notion that recreation has no environmental impacts is no longer tenable. Recreationists often degrade the land, water, and wildlife resources that support their activities by simplifying plant communities, increasing animal mortality, displacing and disturbing wildlife, and distributing refuse" (ibid, p.3) "Recreational disturbance has traditionally been viewed as most detrimental to wildlife during the breeding season. Recently, it has become apparent that disturbance outside of the animal's breeding season may have equally severe effects" (p.73) "People have an impact on wildlife habitat and all that depends on it, no matter what the activity" (p.157); "Perhaps the major way that people have influenced wildlife populations is through encroachment

into wildlife areas" (p.160). "Outdoor recreation has been recognized as an important factor that can reduce biosphere sustainability.... Indeed, recreational activities, including many that may seem innocuous, can alter vertebrate behaviour, reproduction, distributions, and habitats" (p.169).

Knight & Gutzwiller's book contains numerous specific examples of how these negative effects are created. We may not know what the organisms are thinking, but the effect is that they die, are forced to expend extra energy that may be in short supply, become more susceptible to predation, or are forced to move to less suitable habitat, losing access to preferred foods, mates, nesting sites, etc. Since most of us live safely in the midst of plenty, it is hard for us to understand wildlife's predicament. We are flexible enough to survive almost anywhere; they are not. Often they have no other place to live. None of the existing "studies" on mountain biking evaluate its effects on wildlife. They are usually concerned only with visible effects on the trail. In Tilden Regional Park, there are three separate, heavily used mountain biking trails through the middle of supposedly protected Alameda whipsnake habitat areas!

"Displaced animals are forced out of familiar habitat and must then survive and reproduce in areas where they are not familiar with the locations of food, shelter, and other vital resources.... Hammitt and Cole ... ranked displacement as being more detrimental to wildlife than harassment or recreation-induced habitat changes.... Densities ... of 13 breeding bird species were negatively associated with the intensity of recreation activity by park visitors, primarily pedestrians and cyclists" (ibid, pp.173-4); "off-road vehicles can collapse burrows of desert mammals and reptiles" (p.176).

### Sociology

Hikers, especially the elderly, have been abandoning their favorite trails, due to bikers that scare them, hit them, harass them, and destroy the serenity of the parks. Parks are supposed to be a refuge from the crush of humanity and the noise, danger, and artificiality of urban areas. Why bring to our parks the very things that most people go there to escape?! There is absolutely nothing wrong with bicycling, in its proper setting (on a road). It is a wonderfully healthful activity. But wildlife is already in danger due to loss of habitat (worldwide, one quarter of all animals are threatened with extinction, according to the IUCN (International Union for the Conservation of Nature and Natural Resources)). It can't afford to lose any more. And people have very similar needs for being

in nature. Our elderly are like wildlife, in that they have nowhere else to go for the experience of nature that they are accustomed to.

By definition, hiking trails are the minimum size necessary for a person to hike (approx. 18 inches wide), since they are supposed to have a minimal impact on the environment. They aren't wide enough for a bicyclist to safely pass a hiker or another bicyclist. Mixing bikers and hikers is dangerous for both. In fact, mountain biking is also dangerous for lone riders, since hiking trails don't follow a predictable pattern and have very short sight distances (the distance that one can see ahead on the trail). Emergency room doctors report that a large percentage of mountain bikers incur serious accidents.

"The record includes hundreds of letters from park users recounting stories of collisions or near misses with speeding or reckless bicyclists on all kinds of trails but particularly on steep and narrow trails. Hikers and bird watchers repeatedly told how they have been forced off of trails by speeding bicycles and how they have had their peace and solitude on the trails interrupted by bicycles that -- because they are quiet and fast -- seemed to appear out of nowhere and be immediately upon the hikers and other users. Equestrians told how their horses have been startled by speeding or oncoming bicycles and have become restless, on several occasions even throwing and injuring experienced riders. Though most users admitted that the great majority of bicyclists were polite and safety-conscious, letters from hikers, equestrians, bird watchers, joggers, and other users also repeatedly recounted incidents of rudeness, threats, and altercations when they have complained to an offending bicyclist about dangerous conduct. Park staff also reported having received such complaints. ... NPS's [National Park Service's] finding that user conflict and visitor danger would be reduced by limiting bicycle trail access in GGNRA was supported by ample evidence. ... Notwithstanding the responsible user, bicycles are often perceived by other users as a disruptive influence on park trails. Although most of the few reported bicycle accidents in the park involve only single individuals, letters and reports from hikers and equestrians tell of many close calls and confrontational and unsettling experiences". "No single-track trails [in the Marin Headlands] were found suitable for bicycle use" (Bicycle Trails Council v. Bruce Babbitt).

Since bicycles require wider trails, parks now often use bulldozers to create and maintain those trails, vastly increasing their impacts. In Claremont Canyon Regional Preserve in Oakland, California, a new trail was created by means of a "small" (6 foot blade) bulldozer. But it rolled off the trail and had to be rescued by

a much bigger bulldozer. The existence of bicyclists on trails also forces park rangers to police the trails using motor vehicles (cars or motorcycles), since it is the only way they can hope to catch them! This also increases negative impacts on wildlife.

Children learn mostly nonverbally (by watching adults and other children). Mountain biking is bad role modeling for them, since it teaches them that human domination and destruction of wildlife habitat is normal and acceptable.

Mountain bikers like to claim that excluding them from trails constitutes "discrimination". They say that other user groups (hikers and equestrians) receive better treatment from land managers. There is no basis for such a claim, since all users are subject to exactly the same rules. For example, on a trail closed to bikes, everyone is allowed on the trail -- only the bikes are excluded! In spite of what they claim, mountain bikers have never been excluded from any trail! Even if my way of "enjoying" the wilderness is to race my bulldozer there, I am not allowed to do that. And this is not because land managers like hikers more than bulldozer racers. I am not being excluded from the wilderness; I can go there whenever I want, as long as I don't try to bring my bulldozer with me. It is only the bulldozer that is excluded, which is due to its effects on wildlife and people.

If mountain bikers were actually being discriminated against, they could sue park managers for access to every trail that others are allowed on. On the contrary, the U. S. Court of Appeals for the Ninth Circuit (Bicycle Trails Council v. Bruce Babbitt) concluded that the National Park Service has the right to ban bikes from trails. "All units of the National Parks [are] to be treated consistently, with resource protection the primary goal". "All bicycle use of off-road areas [is] prohibited unless local park superintendents [designate] particular trails to be open" (bicyclists were contesting this rule). "Routes may only be designated for bicycle use based on a written determination that such use is consistent with the protection of the park area's natural, scenic and aesthetic values, safety considerations and management objectives and will not disturb wildlife or park resources". "The Park Service is empowered with the authority to determine what uses of park resources are proper and what proportion of the park's resources are available for each use". "The use of bicycles is allowed in park areas under the same basic conditions as are motor vehicles, i.e. on park roads, in parking areas, and on routes designated for their use. ... certain limitations on their use are necessary and appropriate in the interest of public



safety, resource protection, and the avoidance of visitor conflict" [emphasis added].

Clearly, bikes are not being banned from trails because land managers like hikers and equestrians more! As people, mountain bikers are indistinguishable from other park users. It is the bikes that we object to, and not even the bikes, but their presence in natural areas. Banning bikes is simply a humane way of protecting our natural areas, while allowing all users equal access to enjoy them. Thus, whether bikers or hikers or equestrians are more harmful to wildlife (they all are, of course) is irrelevant. Restricting bicycle access is a way of reducing human impacts on wildlife and wildlife habitat.

### The Case of Brown's Woods

Brown's Woods, one of the last stands of native forest in central Iowa (southwest of Des Moines), illustrates these issues. It was saved from logging and development in 1972 by the S. E. Polk (High School) Ecology Club and their sponsor, biology teacher, Kirk Brill, for which they won a national award. Motorized vehicles were banned, "because of the threat they posed to the environment and to persons walking there" (Wayne Bills, Polk County Conservation Board (PCCB) Executive Director, 1972). The students worked hard to earn money to build two miles of bike trails through the preserve.

However mountain bikers illegally built 4 1/2 additional miles of trail ("bikers have gouged more than six miles of trail, up to 30 feet wide and a foot or more deep in spots" (Loren Lown, PCCB Natural Resources Specialist, 1996)). Wildlife were disappearing, elderly hikers were driven out, and vegetation was destroyed. "Already the bikers have caused permanent irreparable damage to this pristine area" (Ben Van Gundy, PCCB Director). It was called "ecological vandalism". Last year, once again, Brill and his students were forced to campaign to save the preserve, this time from mountain bikers, and won, getting a unanimous vote of the PCCB for a "total and permanent ban on the use of mountain bikes" in Brown's Woods.

Millions of mountain bikes are being sold every year around the world. Let's not wait till "bikers have caused permanent irreparable damage" to our other natural areas! We can't eliminate all environmental damage, but we can eliminate frivolous, unnecessary damage. True civilization is characterized by restraint.

"It is expected that outdoor recreational activity will continue to increase, while the amount of wild land where wildlife may seek

refuge from disturbance will decrease" (Knight and Gutzwiller, p.327); "Recreationists are, ironically, destroying the very thing they love: the blooming buzzing confusion of nature.... The recreation industry deserves to be listed on the same page with interests that are cutting the last of the old-growth forests, washing fertile topsoils into the sea, and pouring billions of tons of greenhouse gases into the atmosphere" (p.340; emphasis added); "Tom Birch ... argues that wilderness managers, charged with incarcerating wilderness, are more concerned with the advancement of their careers through achieving quantifiable goals (number of park visitors, total revenues) and developing park and forest amenities (roads, 'scenic' turnouts, restrooms, paved trails, maps, campgrounds) than with perpetuating the land community of which they are a part" (p.344).

Ideally, we should be working to reduce all human access to wildlife habitat. But at the very least, we should eliminate mechanical access (with the exception of small compromises for wheelchairs).

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Vandeman, Michael J., Ph.D.

<http://www.imaja.com/change/environment/mvarticles/> &

<http://home.pacbell.net/mjvande>

Wildlife Need Habitat Off-Limits to Humans!  
Michael J. Vandeman, Ph.D.  
January 27, 2002

A mile-long, hundred-meter-wide hillside in one of our regional parks is covered with nothing but chaparral -- mostly coyote bush, with occasional coast live oak, bay laurel, coffee berry, California sagebrush, manzanita, gooseberry, poison oak, blackberry, sticky (bush) monkeyflower, and smaller plants. It hosts whitetail deer, fence lizards, rabbits, spotted skunks, red-tailed hawks, rattlesnakes, ringneck snakes, and other snakes.

The area is pristine. In forty years I have never seen a human being there. It's obvious that no one has an interest, nor a need, to go there, or they would have done so. So I thought, Why not make it official -- declare it off-limits to humans, and thereby protect the wildlife whose home it is, in perpetuity! I made this suggestion in a letter to the East Bay Regional Park District. Silly me! The Park District replied that as soon as they put up a sign, people would immediately want to go there!

And so it has gone, for six million years of human evolution: there has never been one square inch of the Earth that is off-limits to all humans. Wildlife lived here for four billion years before we showed up, and adapted to habitat that was human-free. Then we arrived, and decided that the entire Earth belongs to us -- every square inch! We have, we think, the right to go wherever we want, and do whatever we want there. And to assuage our conscience, we have developed an art of rationalization second to none.

Humans are the ants at every other species' picnic. The first thing that every child learns about wildlife is that, with few exceptions (mosquitoes seem to like us, at least up to a point), they don't want us around. As soon as we try to get close to them, they run, slither, fly, or swim away. And with good reason! Even our own research (see e.g. Boyle and Samson, or Knight and Gutzwiller) shows that the presence of humans is harmful to wildlife. We bring disease, cause energy-draining stress, drive animals away from their preferred mates and resources, and alert predators to their location. But do we try to look at things from the wildlife's point of view, so that we can provide them what they need, and thereby ensure their survival? No. In fact, anyone who tries to make use of our natural talent for empathy, and apply it to other species, is accused of the sin of "anthropomorphizing".

As I said, not every species is sensitive to the presence of humans, but in every area, there are at least some that are. Therefore, if we are to reach our goal of not causing any more extinctions, we will need to start setting aside some habitat that will be off-limits to all humans. Try to find the concept in any library! It isn't recognized. Perhaps closest is the concept of "wilderness". But wilderness has, unfortunately, come to mean "human playground". In ancient and recent times there were "sacred lands", but these have always been open to the priests and shamans. Now we have "wildlife refuges", but these are still open to biologists -- and to drilling for oil.

Our most protected lands -- national parks, still provide inadequate protection for the wildlife they host: they continue to lose species and populations. Another reason for setting aside human-free habitat is that many animals are too dangerous for us or our livestock -- e.g. grizzlies, tigers, wolves, elephants, crocodiles, sharks, etc.

The Scots have shown us the way. All gardens in Scotland, I am told, have a section "for the fairies". I have set aside a 20x20 foot area in my back yard as human-free habitat. Many others have done likewise. If you own land, set aside a section of it for the exclusive use of the wildlife. Investigate putting a clause in your will that will maintain its human-free status after your death. Note how you and others react. Then ask every landowner whom you know, especially park managers, to do the same. Watershed lands (whose purpose is protecting water and wildlife, not recreation), military reservations, lands with radiation and other hazards (e.g. volcanoes and Chernoble), private land, trail-less sections of public lands, sanctuaries and critical habitat for endangered species (e.g. the Condor Sanctuary), and any land where humans can't get along with each other (e.g. Palestine or Kashmir), are good candidates. Even if you meet resistance, as I have, the process of discussing human-free habitat is beneficial and very educational.

But aren't humans a part of nature, just like everything else? Sure we are a part of nature, or we wouldn't be able to interact with it. The real question is what part of nature are we? Clearly, the most destructive part. Or to put it another way, we are a species that is native to part of Africa, and everywhere else is a rank newcomer -- an exotic species. I don't think this means that we have to all move back to Africa, but it does mean that we need to practice restraint -- assume the manners of a guest.

We obviously need to experience wilderness in order to appreciate it, but equally obviously, we need to stay out of it, if it is to be preserved.

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~~Re: Misene Marks State Park etc.~~

4-16-2003

~~Gentlepersons:~~

~~Please keep cows and other exotic species out of the parks. If allowed in, dogs should be on leash at all times. Please restrict bicycles and all other vehicles (including mountain boards) to pavement!~~

Sincerely,

~~Michael J Vandeman~~

Michael J. Vandeman

2600 Camino Ramon # 2E850R

San Ramon, CA 94583-5000

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APR 17 2003

NORTHERN SERVICE  
CENTER

# County of Santa Clara

Environmental Resources Agency  
Parks and Recreation Department

298 Garden Hill Drive  
Los Gatos, California 95032-7669  
(408) 355-2200 FAX 355-2290  
Reservations (408) 355-2201  
[www.parkhere.org](http://www.parkhere.org)



April 15, 2003

California State Parks  
Northern Service Center  
ATTN: Ellen Wagner  
P.O. Box 942896  
Sacramento, CA 94296-0001

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APR 21 2003

NORTHERN SERVICE  
CENTER

Dear Ms. Wagner,

The Santa Clara County Parks and Recreation Department (County Parks) has reviewed the **PRELIMINARY GENERAL PLAN/DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE FOREST OF NISENE MARKS STATE PARK**, dated March 2003, and is pleased to note that State Parks is interested in trail and biologic corridors that might connect Nisene Marks with Uvas Canyon County Park (pages 5 and 6). County Parks also supports State Parks' intent to evaluate properties adjacent to the northeast portion of Nisene Marks for possible connections to Uvas Canyon County Park (page 118).

Please note that two trail routes identified in the 1995 Santa Clara County *Countywide Trails Master Plan Update* (the Trails Element of the General Plan) are located along or at Summit Road, near the northern boundary of Nisene Marks. Regional trail route R5-A, the Bay Area Ridge Trail, Santa Cruz Mountains alignment, is along Summit Road. It is designated for hiking, on-road bicycle, and equestrian use. Connector route C28, the Uvas Reservoir to Uvas Canyon County Park Trail, is located within Uvas Canyon County Park and terminates at Summit Road. This trail is designated for hiking and equestrian use.

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County Parks supports the effort to establish trail connections between Nisene Marks State Park and Uvas Canyon County Park, and is pleased to note State Parks' interest as stated in the Preliminary General Plan/Draft EIR for the Forest of Nisene Marks State Park.

If you have any questions regarding the above comments, feel free to contact me at 408.355.2230 or via email at [Kelly.Gibson@mail.prk.co.santa-clara.ca.us](mailto:Kelly.Gibson@mail.prk.co.santa-clara.ca.us)


Sincerely,

Kelly Gibson  
Trail Planner

cc: Mark Frederick, Manager of Planning and Real Estate, Santa Clara County Parks and Recreation Department  
Lisa Killough, Director, Santa Clara County Parks and Recreation Department  
Cathy Woodbury, Planning Manager, Mid Peninsula Regional Open Space District



Board of Supervisors: Donald F. Gage, Blanca Alvarado, Pete McHugh, James T. Beall Jr., Liz Kniss  
County Executive: Richard Wittenberg

 Nisene marks state park

*Edna Lee Kelly*  
*P.O. Box 731*  
*Aptos, California*  
*95001*

RECEIVED

APR 21 2003

NORTHERN SERVICE  
CENTER

April 10, 2003

California State Parks  
Northern Service Center  
Attn: Ellen Wagner  
P.O. Box 942896  
Sacramento, California 94296-0001

**RE: FOREST OF NISENE MARKS STATE PARK**

Dear Ms. Wagner:

A recent article by Rich Apple which was published in the Santa Cruz Sentinel alerted readers to a plan being pushed forward by the State Parks Department to allow mountain bikes above the steel bridge.

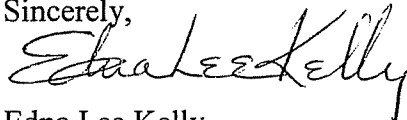
According to Apple, the deed from the Marks family, gifting the property to the state of California, "specifies that the property 'be preserved for all time as a natural preserve' and that the use of the property (roughly above the steel bridge) 'shall be limited to camping, nature study, hiking, and associated activities.' The deed also states 'that there shall be no horseback riding thereon.' "

As someone who grew up on the back of a horse and who has ridden thousands of miles, I agree with this deed restriction. I have seen many trails worn down by erosion from continued use by horseback riders. I have also seen severe damage and erosion on trails and hillsides used by bicyclists. Nisene Marks State Park is **NOT** a park for horses or bicycles. It should be preserved as a "natural preserve."

It is a beautiful, peaceful, quiet retreat, and many times I have taken young children to the park to hike along the creek, to point out some of the native plants, or the deer and raccoon prints in the mud, or the fossil rocks, to show them some of the giant stumps of the redwoods that were logged a hundred years ago. And many times we have had to jump out of the way, or scurry to the side of the road or the trail, to avoid a bicyclist flying along at top speed.

Please honor the gift of the Marks family by upholding the use restrictions specified in the deed.  
**PLEASE DO NOT ALLOW HORSES OR BICYCLES IN NISENE MARKS PARK.**

Sincerely,



Edna Lee Kelly

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27



422 Locust ST  
Santa Cruz, Ca  
95060

April 17, 2003

Re: Nisene Marks

I was dismayed to learn about the possibility of allowing mountain bikes on the trails above the steel bridge. What a threat to the intent of the deed!

I was familiar with the Preserve in the late 60's. It was more pristine then. We should do our best to preserve its integrity for future users.

It seems a convoluted argument that the state categorization, Natural Preserve, predates the existence of mountain bikes.

I hope that you and others will view and walk the Forest/Preserve.

Sincerely  
Mrs. Sally Sumpb

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APR 22 2003

NORTHERN SERVICE  
CENTER

Marcia L. Smith

535-D Sumner St  
Santa Cruz, Ca. 95062.

April 16, 2003

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APR 22 2003

NORTHERN SERVICE  
CENTER

California State Parks  
Northern Service Center  
Attention: Ellen Wagner  
P.O. Box 942896  
Sacramento, CA. 94296-0001

To Whom It May Concern,

I am writing regarding the Preliminary General Plan / Draft Environmental Impact Report for the Forest of Nisene Marks State Park, and specifically to "vote" in favor of Alternative C (see attached).

29

The problem, as I see it, at Nisene Marks, is that almost all the user impact is in the area below the steel bridge, and this is the only area in the park with any singletrack open to bicycles. The report states that only 2% of users make it up to Sand Point, and to me, this is the area of the park that should be open to bicycles. Bicycles can travel far, and it makes sense to get them out of the most impacted areas. But the problem is that in terms of mountain biking, fire roads are boring. Singletrack is fun, and challenging, and yet there are no trails open to mountain bikers in these areas.

The report lists 3 alternatives. Alternative A uses a tactic that is being used extensively now to ban bicycles: turn it into Wilderness. This is unfair, and puts mountain bikers in the uncomfortable position of having to vote against wilderness designation to preserve their access to these areas. It also removes the Aptos Creek fire road that connects Buzzard's Lagoon and the Soquel Demonstration Forest to Nisene Marks. In addition to creating a potentially dangerous situation, this would eliminate a popular training ride for mountain bikers and cyclocross racers. Alternative B is better, but Alternative C opens up the possibility for some singletrack riding in the park.

Off-road cycling is a low-impact, human-powered, legitimate recreation activity with more than 35 million annual U.S. participants (2.5 million in California), that contributes more than \$6 billion annually to the U.S. economy (\$2 billion in California). The majority of cyclists are responsible, considerate riders, who give back to their local trail systems by volunteering on public land, protecting the environment and preserving open space (the people involved with [www.trailworkers.com](http://www.trailworkers.com) have done a fantastic job of working with the Soquel Demonstration Forest, in particular). It's a great form of exercise, it allows people to travel further into the backcountry than they can when walking, and it's fun.

Mountain bikes have a similar impact on the trail as hikers (see <http://www.imba.com/resources/science/index.html>). Trail damage typically stems from poorly constructed heavily used trails. Trails can be built for all user groups to enjoy, to control speed, and to support shared use. There are a lot of alternatives - new trails can be built, trails can be redesigned, there can be one-way trails, trails open only to some user groups, trails open to various user groups at various times, etc. (see [http://www.imba.com/resources/trail\\_building/index.html](http://www.imba.com/resources/trail_building/index.html)).

Mountain bikers have been characterized as thrill-seekers who care nothing about Nature. This is not true of any of the cyclists I know. Most cyclists have a deep love of, and appreciation for, natural beauty, and biking allows one to get further away, deeper into the backcountry, to experience that solitude and peace - *and* exercise hard and have fun on the way. Yes, there are some users, just as in *all* user groups, who don't follow the rules. It is important to judge all trail users by the collective group, not a few inconsiderate people, and to deal with those people rather than excluding an entire user group.

Thanks for considering this Plan!

Sincerely,  
Marcia Lynn Smith

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APR 22 2003

NORTHERN SERVICE  
CENTER

Ellen Wagner  
California State Parks  
Northern Service Center  
P.O. Box 942896  
Sacramento, CA 94296-0001

*Re: Preliminary General Plan/Draft Environmental Impact Report  
for the Forest of Nisene Marks State Park (SCH#2001022080)*

*Humans are urbanizing animals, and parks are set aside for uses ranging from urban sports and recreation to wilderness areas open only to those on foot, and sometimes not open to anyone.*

*Some people desire a non-urbanized area, or an area that is quiet enough to give the illusion of solitude and the opportunity for quiet contemplation or observation of the non-human life forms in such an area. Also an area where people can take walks. These places are what used to define parks. Picnic grounds and tent camping areas might be part of these old style parks.*

*Other people, more the urban kind, want the sort of park that has tennis or volley ball courts, perhaps a golf course, places to use mountain bikes, skate boards, skis and ski lifts, swimming pools and shower rooms, increasingly large parking areas, barbecue pits, non-native horticulturally cultivated plantings, perhaps a little shop and restaurant, cement walkways, paved roads, etc. All these things require those extensions of humans which define urbanization, that is, buildings and equipment that is manufactured solely for increasing populations of humans. This is what so many parks have become as human populations have increased and more people live in urban surroundings and have urbanized values.*

*A park is basically an open space accessible to everyone and largely paid for by taxes. What goes on there is determined by the majority desires of the public.*

*In a democracy majority rules, but minority interests are also protected. Those who desire old style walking trails in parks may be in the minority, but there should be portions of parks which are set aside for the single area use of walkers. Presently in many parks there are portions set aside as much as possible for people in wheel chairs, and, hopefully, they will always be even more in the minority than walkers.*

*Mountain bikes are an urban feature taken into parks. If it is feasible there may be parks wherein there are trails set aside for mountain biking only. Any walker using them would be expected to get off the trail when bikes came through. The sport of mountain bike thrills and skills achievements is increasing and public lands are expected to accommodate those who create*

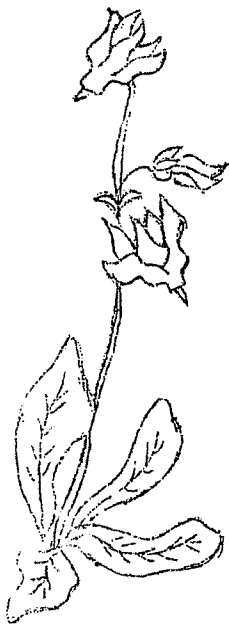
"thrill hills" or "drop-ins" off of park trails and across park vegetation and lands. If a public land's purpose, such as many State Park lands, is to preserve the non-humanized lands and plants, then such use of the parks is against that purpose.

Lands must be found that can accommodate the erosion and plant demolishment that mountain bike sports need for thrills and skills. In Florida there have been parks created by using land fills which have reached capacity. The hills that resulted from piling up refuse were covered with soil and planted and walking and road bicycling paths were developed. In California there are similar landfills, supported by taxpayer money, which have reached capacity and could be converted to mountain bike sports hills. A mini-sports jumping-hills park has been created across the street from the Aptos California Post Office by the young people who use it to practice their leaping bike and skate board skills. Similar do-it-yourself projects are present in many communities. There would probably be many volunteers who would help develop such places out of presently public owned land fills which had reached their end of capacity, such as some of the Santa Cruz County landfill areas. Without such places the mountain bike speed and thrills lover must use those parks that were originally set aside to preserve some natural areas.

There are already some parks where equestrian paths are designated, and any walker using them does so with the understanding that they must behave carefully around the horses and not complain about the droppings.

Shared use or multi-use trails are appropriate where the trails can be wide enough to accommodate walkers, wheel chairs, horses, bicycles, baby strollers, leashed dogs, etc. On narrow trails, especially those along the sides of hills, trails must be designated for single use if they are in an area where there are many park users. In very remote areas where few people a day use the narrow trails there can be more of a shared use attitude. But in a heavily used area such as the lower part of The Forest of Nisene Marks State Park so close to urban development there have to be stringent rules and separation of trail uses because population is increasing and use of the park is going to become limited, just as it has become in Yosemite and in other popular parks that have just about become loved to death.

Sincerely,  
Emma Wagner Fichter



# PLEASE DON'T PICK THE WILDFLOWERS

We're used to growing and picking cultivated flowers from our gardens. We forget that we do not plant and tend the wildflowers and that they lead a precarious existence. The years when they are plentiful are matched by years when conditions are unfavorable for them. They must have as much chance as possible to produce seeds. Every wildflower picked means a loss of the many seeds it could have produced. Please, let wildflowers go to seed.

People cover much of the earth with buildings, roads, and parking lots, and replace wild plants with cultivated crops and gardens full of hybrids developed by people. Not many wildflowers can survive the onslaught of bulldozers and the regimented structure of human horticulture.

Some wildflowers do adapt to man-altered environments and grow plentifully enough to be picked without harm. But the trilliums and harebells, shooting stars and blue-eyed grass, and many others, are steadily losing the places where they can grow. In the few places we leave to them the wildflowers need protection. Please do not pick them.

To have a bouquet of wildflowers paint or photograph pictures of them. Use wildflower motifs in embroidery, jewelry, pottery, etc. If humans succeeded in turning most of the earth into the architecture and horticulture that are extensions of humans, then pictures and representations of wildflowers may be appreciated as records of the pre-human past.

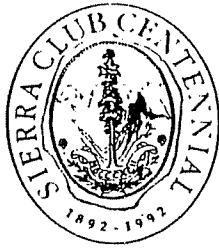
Environmental projects should include preserving a little of the planet as it was before the human species manipulated it. Certain land areas should be set aside as wildflower preserves. Other spots of land could be purposely developed as artificial preserves where wildflowers were carefully tended to encourage growth. People could even transplant wildflowers from places where buildings and bulldozers are going to destroy them and put them into such artificial preserves; reservations for the wildflowers.

"Both the humanized landscape and the wilderness have a place in human life, because they satisfy two different but equally important needs of man's nature. Modern man retains from his evolutionary past some longing for the wilderness, even though civilization has given him a taste for farmland, parks, and gardens. Conservation policies must involve much more than providing amusement grounds for sightseers and weekend campers; they must be concerned with the biological and cultural aspects of the human past." -- Rene Dubos, "So Human an Animal" (Scribners, 1968)

If you will look, you will find wildflowers that are delicate and lovely spirits, precious and rare, free and wild. Please cherish them, and leave them to live out their life cycle as you would do for a songbird or a butterfly. Please do what you can to have wildflowers protected for future people to appreciate.

fawn lily • star flower • buttercup • clintonia • baneberry  
golden eggs • mariposa lily • houndstongue • pentstemon  
babys lace • fox violet • persephone • indian fire • watery iris

# SIERRA CLUB



Santa Cruz Regional Group of the Ventana Chapter

P.O. Box 604, Santa Cruz, California 95061 (408) 426-4453

April 12, 2003

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APR 22 2003

NORTHERN SERVICE  
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California State Parks  
Northern Service Center  
P.O. Box 942896  
Sacramento, CA 94296-0001

ATTN: Ellen Wagner

Dear Ms. Wagner,

The Santa Cruz Regional Group of the Ventana Chapter of the Sierra Club finds The Forest of Nisene Marks Preliminary General Plan to be both insufficient and gravely faulted in many respects. We are especially disappointed in the level of analysis of this general plan given the lengthy dialogue, negotiations, and agreement that the Club has had with the Parks Department regarding the Castle Rock General Plan. We understand that the Department has experienced difficulties in maintaining continuity during this planning process. These difficulties are obvious in the document which is largely incomplete, poorly collated, and often incongruous with some sections referring specifically to survey data and other sections remaining entirely speculative.

Overall, we disagree with Parks' current attempt to tier environmental review for Nisene Marks State Park. A more correct attempt would contain more complete species and habitat inventories, complete maps, analyses of regional recreational opportunities and ecological conservation needs and a range of alternatives that currently do not appear. The current level of analysis is insufficient to weigh the impacts of the alternatives currently considered, including: the placement of facilities, the designation of areas of the park as natural preserves, the continued use of current visitor facilities, carrying capacity, cumulative impacts, and commitment of future Parks resources.

31

*"...to explore, enjoy and protect the wild places of the earth."*

Printed on Recycled Paper

We find errors in the following:

There is no comprehensive biological inventory of the park; directives on General Plans specify that a resource inventory is first completed upon which the General Plan is based. On page 24, it says “surveys specific to this planning effort have not been performed.” Without such an inventory, Parks cannot fulfill CEQA section 15003 (d): demonstrate to the public that your agency has analyzed and considered ecological impacts of your actions. Without such a biological inventory, Parks cannot effectively analyze the potential need for special designations of the park such as natural preserve(s). The cumulative impacts to sensitive species and habitats, both on site and elsewhere in the region, of designating use intensities, park unit classification, and continued current use of trails has not been sufficiently addressed. Again, a comprehensive biological inventory is necessary.

32

Several habitats listed as sensitive by the California Department of Fish and Game are not specified as such.

33

Several sensitive habitats and species are specifically mentioned in the document, but no maps are provided, and so the public is inadequately informed.

34

The carrying capacity section is confusing and inadequate; it has clearly been written by two vastly different points of view, beginning by proposing a modern carrying capacity analysis but shifting to the more typical, inadequate Parks version of analysis using “zones” of use without any methods of monitoring such activity or biological basis for determining these zones.

35

Several geographical features are mentioned throughout the text but are not referenced on maps and so the public is inadequately informed.

36

The environmental documents do not include the CEQA checklist.

37

There is no evidence of consultation with other public agencies about this plan as required by CEQA section (a) (5) (and others).

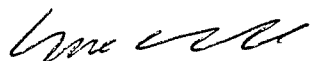
38

We suggest that this Preliminary General Plan be amended with complete biological inventories (including regional information), a modern carrying capacity analysis, and a sufficient cumulative impacts analysis. We also request amendments to the documents that would allow the public the



opportunity to adequately assess the impacts of the plan, the plan's alternatives, and the cumulative impacts to the habitats and species that may be impacted by the plan.

Very Sincerely Yours,

A handwritten signature in black ink, appearing to read "George Jammal", with a stylized, cursive script.

George Jammal, Co-Chair  
Santa Cruz Regional Group, Sierra Club

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APR 23 2003

NORTHERN SERVICE  
CENTER

From Penny Hanna  
Slim Helpern  
213 MIRADA DR  
Aptos CA 95003

California State Parks - Northern

4/10/03

Dear Ellen,

As hikers and recreational bikers  
we strongly urge the State Parks system  
to keep Nisene Marks State Park as  
natural as possible, and NOT allow  
bikes beyond the "steel bridge". It's  
really scary to hike on most of the  
trails as is because bikers flaunt  
the current restrictions. Thanks